

EXHIBIT 118

REDACTED



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2 IN RE:

3 GOOGLE ANTITRUST LITIGATION

4 60-516110-0004

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10 ** HIGHLY CONFIDENTIAL **

11 REMOTELY CONDUCTED

12 DEPOSITION OF [REDACTED]

13 Vancouver, Canada (Witness's location)

14 Tuesday, November 10, 2020

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20 Stenographically reported by:

21 LORRIE L. MARCHANT, RMR, CRR, CCRR, CRC

22 California CSR No. 10523

23 Washington CSR No. 3318

24 Oregon CSR No. 19-0458

25 Texas CSR No. 11318

26

27 Job No.: 2020-93264

1 A P P E A R A N C E S

2 (All appearances remotely via Zoom)

3 Appear as counsel on behalf of The United States
4 Department of Justice Antitrust Division:

5 U.S. DEPARTMENT OF JUSTICE
6 BY: MICHAEL WOLIN, ESQ.
MICHAEL McLELLAN, ESQ.
JOHN LINDERMUTH, ESQ.
450 Fifth Street, N.W.
7 Washington, D.C. 20530

8 Appear as counsel on behalf of the State of
9 Texas:

10 OFFICE OF THE ATTORNEY GENERAL
11 BY: TREVOR YOUNG, ESQ.
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300 West 15th Street
Austin, TX 78701

12 Appear as counsel on behalf of Google:

13 AXINN VELTROP & HARKRIDER
14 BY: JOHN D. HARKRIDER, ESQ.
DANIEL S. BITTON, ESQ.
15 114 West 47th Street
New York, NY 10036

16 Also present:

17 Alexander Bergersen, Esq., Google
18 Lara Kollios, Esq., Google
Eric Peterson
19 Alexandra Logan
Jose Reyes, Lexitas Monitor Tech

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1 MR. WOLIN: Sure.

2 MR. HARKRIDER: Okay. Can we have a count?

3 I have I think -- off the record.

4 (Recess taken, from 3:47 to 4:02.)

5 BY MR. WOLIN:

6 Q. [REDACTED] I want to turn to discussing
7 video advertisements. That was something that you
8 focused on earlier in your tenure at Google; is that
9 right?

10 A. That's correct.

11 Q. You were a product manager for video
12 advertisements?

13 A. Not exactly. I was [REDACTED]

15 Q. What were those features?

16 A. Those features included the ability to
17 upload video files, video creatives, set them up in
18 the product.

19 They included things like better reporting
20 that accounted for all the different metrics that
21 matter when you run a video campaign versus other
22 types of campaigns. It involved allowing the
23 publisher to set up their inventory to account for
24 video and nonvideo inventory.

25 Q. In that work, you became familiar with some

1 of the differences between video ads and display
2 ads; is that right?

3 **A. That's correct.**

4 Q. So video ads have motion; correct?

5 A. **Video ads generally have motion, but not**
6 **always.**

7 Q. They generally have sound?

8 A. **They generally have sound.**

9 Q. **Display ads, generally, is a static image;**
10 **is that right?**

11 A. **So display ads can be -- can also have**
12 **videos embedded in them. In fact, many display ads**
13 **are so-called rich media ads that also have videos**
14 **in them that also have very similar characteristics**
15 **to video ads.**

16 **The difference here is less about the ad**
17 **itself, which could -- in both cases have motion or**
18 **not have motion, or have sound or not have sound,**
19 **but actually where the ad is placed.**

20 **So generally speaking, if the ad is placed**
21 **in a video stream, that is referred to as an instream**
22 **ad. If it's placed on a page with text and other**
23 **content, that's generally referred to as a display**
24 **ad.**

25 Q. Are there any other differences between

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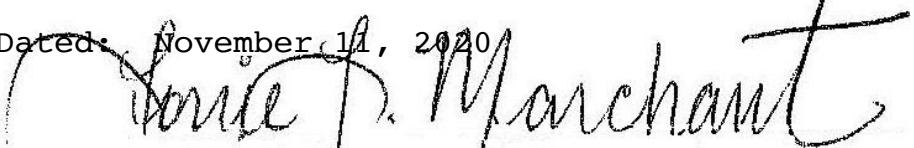
1 STATE OF CALIFORNIA)
2) ss.
COUNTY OF SONOMA)

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4 I do hereby certify that the foregoing
5 proceedings were reported by me to the best of my
6 ability and thereafter transcribed into typewriting
7 under my direction.

8 I further certify that I am not of counsel
9 nor attorney for either or any of the parties
10 hereto, nor in any way interested in the outcome of
11 the cause named in the caption.

12 Dated: November 11, 2020

13 
14 LORRIE L. MARCHANT, RMR, CRR, CCRR, CRC
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Oregon CSR No. 19-0458
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